

Howard County Amended Citizen Participation Plan

Preparation of this document fulfills the U.S. Department of Housing and Urban Development (HUD) requirements with respect to the preparation of a written citizen participation plan, pursuant to 24 CFR 91.105 and 24 CFR Part 5 of the Entitlement Grant Programs. Howard County is amending its Citizen Participation Plan to incorporate the Affirmatively Furthering Fair Housing requirements.

Amended April 2020

A. General Goal of the Plan:

The goal of the Citizen Participation Plan is to provide all citizens of Howard County with adequate opportunity to participate in an advisory role in the planning, implementation, and assessment of the Howard County CDBG (Community Development Block Grant) and HOME (Home Investment Partnership Funds) programs. The Plan sets forth policies and procedures for citizen participation, which are designed to maximize the opportunity for citizen participation in the community development process. The Citizen Participation Plan presents the County's plan for providing for and encouraging all citizens to participate in the development, revision, substantial amendment, adoption, and implementation of:

1. The Citizen Participation Plan (CPP);
2. The Assessment of Fair Housing (AFH);
3. The Consolidated Plan (CP);
4. The Annual Action Plan (AAP);
5. The Consolidated Annual Performance and Evaluation Report (CAPER);
and
6. Disaster Relief Citizen Participation Planning (DRCPP).

The Assessment of Fair Housing (AFH) replaces the Analysis of Impediments to Fair Housing (AI) to assist the County in identifying fair housing issues and related contributing factors to achieve comprehensive community development goals and affirmatively further fair housing.

B. Standards of Participation:

Howard County shall provide a process for encouraging citizen participation at the community and neighborhood level, as well as participation by local and regional institutions, and shall seek to meet the following objectives:

- 1) The County-wide public information meetings shall be organized to seek participation and input from Continuum of Care, community-based and faith-based organizations, the business community, developers, nonprofit organizations, philanthropic groups and the public at large to seek their

participation in the development of the AAP, AFH, CP and the CAPER. The County shall work with the Citizen Advisory Committees where comprehensive neighborhood revitalization areas have been designated and where community programs are currently underway.

Pursuant to 24 CFR 91.100(e)(1)-(3), Howard County shall consult with community-based and regionally-based organizations that represent protected class members, and organizations that enforce fair housing laws, such as state and local fair housing enforcement agencies, including participates in the Fair Housing Assistance Program (FHAP); Fair Housing Organizations; Nonprofit organizations that receive funding under the Fair Housing Initiative Program (FHIP); and other public and private fair housing service agencies, to the extent that such entities operate within the County. The consultation process shall be conducted to seek participation from any organization that has relevant knowledge or data to inform the AFH and the CP.

All aspects of citizen participation shall be conducted in an open manner with freedom of access for all interested persons. Special emphasis has been placed on encouraging participation by persons of low and moderate incomes, residents of blighted neighborhoods, and residents of areas where community development funds are utilized. Citizens are encouraged to participate in all phases of the CDBG and HOME programs and will be provided meaningful access to program information. Citizens will be furnished information that could include the amount of CDBG and HOME funds expected and the range of activities that may be undertaken.

In addition, the County will further expand participation to involve low and moderate-income members of minority groups, the elderly, persons with disabilities, and other persons directly affected by these programs.

A sign language interpreter will be available upon request by contacting the Department of Housing and Community Development (410) 313-6318. The service must be requested at least 3 business days prior to the date needed.

- 2) Pursuant to 91.115(a)(4), the County will meet the needs of non-English speaking residents at public hearings where a significant number of non-English speaking residents can reasonably be expected to participate. The County has several resources for assisting non-English speaking persons to participate. The first resource is the Volunteer Language Bank. Representatives of non-English speaking persons interested in this resource should contact the Department of County Administration at (410) 313-2170. If volunteer interpreters are not readily available, the Office of International Student Services can be utilized. Staff at the Department of Housing and Community Development will coordinate requests through the latter resource. Requests for interpreters should be given no less than 2 weeks in advance of the required date. There are interpreters for over 30 languages, but some of the requested languages include: Spanish, Korean,

Chinese, Mandarin, Cantonese, Vietnamese, Urdu, Sari, Hindi, Japanese, Portuguese and Punjabi. The third resource is the FIRN/Language Connection at (410) 992-1923.

- 3) Vision impaired and disabled persons will be assisted in several ways. Documents will be available in large print upon request. Public hearings will be recorded on standard size audiocassette tape and made available upon request. The Department of Community Resources and Services has a volunteer bank for translation of materials into Braille as well as putting materials on cassette tape. If a citizen has the Jaws computer program, which reads information to a visually impaired person, files will be e-mailed to the person. Additionally, materials will be sent to the Maryland State Library for the blind and physically disabled.
- 4) Pursuant to 24 CFR 91.105(a)(2)(iii), Howard County shall also encourage, in conjunction with public housing agency consultations, participation of residents of assisted housing developments, including any resident advisory boards, resident councils, and resident management corporations, in the process of developing and implementing the AFH and the CP, along with other low-income residents of targeted revitalization areas in which the developments are located. The County shall provide information to the Howard County Housing Commission about consolidated plan activities related to its developments and its surrounding communities so that the Commission can make this available at the annual hearing required for the Public Housing Agency Plan.

C. Scope of Participation:

All aspects of citizen participation shall be conducted in an open manner with freedom of access for all interested persons. Special emphasis has been placed on encouraging participation by persons of low and moderate incomes, residents of blighted neighborhoods, and residents of areas where community development funds are utilized. Citizens are encouraged to participate in all aspects of the CDBG and HOME programs and will be provided meaningful access to program information.

Input will be requested from the public at the following stages:

The Assessment of Fair Housing (AFH)

AFH Development

Howard County shall follow the process and procedures described below in the development of its AFH:

- a. HUD-approved Data for Public Review
The County shall make available to the public, residents, public agencies, and other interested parties any HUD-provided data and other supplemental information that will be incorporated into the AFH at the start of the public participation process. Howard

County will make this information available to the public by cross-referencing to data on HUD's website.

b. Stakeholder Consultation and Citizen Outreach

In the development of the AFH, the County shall consult and encourage participation with other public and private agencies including, but not limited to:

1. Local assisted housing providers;
2. Continuum of Care;
3. Health services and social service agencies, including those focusing on services to children, elderly person, persons with disabilities, persons with HIV/AIDS and their families, and homeless;
4. Non-profit organizations and faith-based organizations;
5. The business community;
6. Developers;
7. Community-based and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws; and
8. Regional government agencies involved in metropolitan-wide planning and transportation responsibilities.

Also, pursuant to 24 CFR 91.100(e)(1)-(3), Howard County shall consult with community-based and regionally-based organizations that represent protected class members, and organizations that enforce fair housing laws, such as state and local fair housing enforcement agencies, including participants in the Fair Housing Assistance Program (FHAP); Fair Housing Organizations; Nonprofit organizations that receive funding under the Fair Housing Initiative Program (FHIP); and other public and private fair housing service agencies, to the extent that such entities operate within the County. The consultation process shall be conducted to seek participation from any organization that has relevant knowledge or data to inform the AFH and the CP.

A variety of mechanisms will be utilized to solicit input from these entities. These include telephone or personal interviews, mail surveys, internet-based feedback and surveys, focus groups, and/or consultation workshops.

c. Public Hearing

To obtain the views of the public on AFH-related data and affirmatively furthering fair housing in the County's housing and community development programs, the County will conduct at least one (1) public hearing before the draft AFH is published for comment.

d. Public Display and Comment Period

The draft AFH will be placed on display for a period of no less than thirty (30) calendar days to encourage public review and comment. The public notice shall include a brief summary of the content and purpose of the draft AFH, the dates of the public display and comment period, the locations where copies of the proposed document can be examined, how comments will be accepted, when the document will be considered for action by the Housing and Community Development Board and County Council, and the anticipated

submission date to HUD. In addition, the County will make available a reasonable number of free copies of the proposed document to residents and groups upon request.

e. Comments Received on the Draft AFH

The County Contact Person, or his/her designee, will accept all public comments during the 30-day public display and comment period. The County will consider any public comments or views in writing, or orally at the public hearings, in preparing the final AFH. A summary of these comments or views, and a summary of any comments or views not accepted and the reason why, will be attached to the final AFH submission to HUD.

Revisions to the Assessment of Fair Housing (AFH) – 24 CFR 5.164

Pursuant to 24 CFR 5.164 Howard County will amend its AFH previously accepted by HUD for the following circumstances:

- 1) A material change occurs. A material change is a change in the circumstances in the County that affects the information on which the AFH is based to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the AFH no longer reflect actual circumstance. A material change could include, but is not limited to:
 - a. A Presidentially declared disaster under title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121*et seq.*), that is of such a nature as to significantly impact the steps the County may need to take to affirmatively further fair housing;
 - b. Significant demographic changes;
 - c. New significant contributing factors in the County; and
 - d. Civil rights findings, determinations, settlements (including Voluntary Compliance Agreements), or court orders.
- 2) Upon HUD's written notification specifying a material change that requires the revision.

Public Display & Comment Period

The draft amended AFH will be placed on display for a period of no less than thirty (30) calendar days to encourage public review and comment. The public notice shall include a brief summary of the revisions, the dates of public display and comment period, the locations where copies of the proposed Amended AFH can be examined, how comments will be accepted, when the document will be considered for action by the Housing and Community Development Board and the County Council, and the anticipated submission date to HUD.

Comments Received on the Proposed Amended AFH

The County Contact Person, or his/her designee, will accept written comments during the 30-day public display and comment period. The County will consider any comments or view of County residents received in writing, or orally at public hearing, in preparing the final

Amended AFH. A summary of these comments or views, will be attached to the final Amended AFH for submission to HUD.

Submission to HUD

Then final Amended AFH will be submitted to HUD within thirty (30) calendar days following the end of the public display and comment period.

The Consolidated Plan (CP)

CP Development

Howard County shall follow the process and procedures described below in the development of its CP:

a. Stakeholder Consultation and Citizen Outreach

In the development of the CP, the County will consult with other public and private agencies including, but not limited to:

1. Local assisted housing providers;
2. Continuum of Care;
3. Health service and social service agencies, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS, and their families, and homeless;
4. Non-profit organizations and faith-based organizations;
5. The business community;
6. Developers;
7. Community-based and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws; and
8. Regional government agencies involved in metropolitan-wide planning and transportation responsibilities.

Also, pursuant to 24 CFR 91.100(e)(1)-(3), Howard County shall consult with community-based and regionally-based organizations that represent protected class members, and organizations that enforce fair housing laws, such as state and local fair housing enforcement agencies, including participants in the Fair Housing Assistance Program (FHAP); Fair Housing Organizations; Nonprofit organizations that receive funding under the Fair Housing Initiative Program (FHIP); and other public and private fair housing service agencies, to the extent that such entities operate within the County. The consultation process shall be conducted to seek participation from any organization the has relevant knowledge or data to inform the AFH and the CP.

A variety of mechanisms will be utilized to solicit input from these entities. These include telephone or personal interviews, mail surveys, internet-based feedback and surveys, focus groups, and/or consultation workshops.

b. Public Hearings

The County will conduct at least two public hearings to obtain residents' views and comments on the needs in the community prior to when the draft CP is published for public comment, during which the County will address housing and community development needs,

development of the proposed activities, the amount of assistance the County expects to receive (including grant funds and program income), the range of activities that may be undertaken, proposed strategies and actions to affirmatively further fair housing consistent with the AFH; and a review of program performance.

c. Public Display and Comment Period

The draft CP will be on display for a period of no less than thirty (30) calendar days to encourage public review and comment. The public notice shall include a brief summary and purpose of the CP, the anticipated amounts of funding (including program income, if any), the dates of the public display and comment period, the locations where copies of the draft CP can be examined, how comments will be accepted, when the document will be considered for action by the Housing and Community Development Board and County Council, and the anticipated submission date to HUD. The County will make available a reasonable number of free copies of the draft document to residents and groups upon request.

d. Comments Received on the Draft CP

The County Contact Person, or his/her designee, will accept written comments during the 30-day public display and comment period. The County will accept any comments or views of the County residents received in writing, or orally at the public hearings, in preparing the final CP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final CP for submission to HUD.

e. Submission to HUD

The CP will be submitted to HUD on or before May 17 before the County's five-year program cycle begin on July 1.

Revisions to the Consolidated Plan (CP) – 24 CFR 91.505

Howard County shall follow the following procedures to amend its CP, as needed.

a. Amendments to the Plan

There are two (2) types of amendments that may occur with the CP; minor amendment and substantial amendments. An amendment to the approved CP is considered substantial under the following circumstances:

1. Changes to its activity priorities or the method of distribution of funds;
2. Using funds for any program covered by the CP, but not previously described in the AAP;
3. Changes in the use of CDBG or HOME funds from one eligible activity to another; and
4. Changes to the purpose, scope, location or beneficiaries of the activity.

All other changes to the method of distribution or investment strategy that do not meet the criteria defined above will be considered minor amendments. Minor amendments will be reviewed and approved by DHCD staff and will not be subject to public comments.

b. Public Display and Comment Period

The proposed Amended CP will be placed on display for a period of no less than thirty (30) calendar days to encourage public review and comment. The public notice shall include a brief summary of the revisions, the dates of public display and comment period, the locations where copies of the proposed Amended CP can be examined, how comments will be accepted, when the document will be considered for action by the Housing and Community Development Board and the County Council, and the anticipated submission date to HUD. In addition, the County will make available a reasonable number of free copies to residents and groups that request them.

c. Comments Received on the Proposed Amended CP

The County Contact Person, or his/her designee, will accept written comments during the 30-day public display and comment period. The County will consider any comments or views of County residents received in writing, or orally at public hearings, in preparing the final Amended CP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final Amended CP for submission to HUD.

d. Submission to HUD

The final Amended CP will be submitted to HUD within thirty (30) calendar days following the end of the public display and comment period.

Howard County shall verify that all amendments to its CP are consistent with its certifications to affirmatively further fair housing and the analysis and strategies of the AFH.

The Annual Action Plan (AAP)

The AAP is a component of the CP which provide a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the CP.

AAP Development

Howard County will follow the process and procedures described in the development of its AAP:

a. Public Hearings

The County will conduct at least two public hearings to obtain residents' views and comments on the needs in the community prior to when the draft AAP is published for public comment, during which the County will address housing and community development needs, development of the proposed activities, the amount of assistance the County expects to receive (including grant funds and program income), the range of activities that may be undertaken, proposed strategies and actions to affirmatively furthering fair housing consistent with the Assessment of Fair Housing; and a review of program performance.

b. Public Display and Comment Period

The draft AAP will be place on display for a period of no less than thirty (30) calendar days to encourage public review and comment. The public notice shall include a brief summary and purpose of the AAP, the anticipated amounts of funding (including

program income, if any), the dates of the public display and comment period, the locations where copies of the draft AAP can be examined, how comments will be accepted, when the document will be considered for action by the Housing and Community Development Board and County Council, and the anticipated submission date to HUD. The County will make available a reasonable number of free copies of the draft document to residents and groups upon request.

c. Comments Received on the Draft AAP

The County Contact Person, or his/her designee, will accept written comments during the 30-day public display and comment period. The County will accept any comments or views of the County residents received in writing, or orally at the public hearings, in preparing the final CP. A summary of these comments or views, and a summary of any comments or view not accepted and the reasons why, will be attached to the final CP for submission to HUD.

d. Submission to HUD

The AAP will be submitted annually on or before May 17 before the start of the County's program year on July 1.

Revisions to the Annual Action Plan (AAP)

The County shall follow the following procedures to amend its AAP, as needed.

a. Revisions Considerations

There are two (2) types of amendments that may occur with the CP; minor amendment and substantial amendments. An amendment to the approved CP is considered substantial under the following circumstances:

1. Changes to its activity priorities or the method of distribution of funds;
2. Using funds for any program covered by the CP, but not previously described in the AAP;
3. Changes in the use of CDBG or HOME funds from one eligible activity to another; and
4. Change to the purpose, scope, location or beneficiaries of an activity.

All other changes to the method of distribution or investment strategy that do not meet the criteria defined above will be considered minor amendments. Minor amendments will be reviewed and approved by DHCD staff and will not be subject to public comments.

b. Public Display and Comment Period

The proposed Amended AAP will be placed on display for a period of no less than thirty (30) calendar days to encourage public review and comment. The public notice shall include a brief summary of the revisions, the dates of public display and comment period, the locations where copies of the proposed Amended AAP can be examined, how comments will be accepted, when the document will be considered for action by the Housing and Community Development Board and the County Council, and the anticipated submission date to HUD. In addition, the County will make available a

reasonable number of free copies to residents and groups that request them.

c. Comments Received on the Proposed Amended AAP

The County Contact Person, or his/her designee, will accept written comments during the 30-day public display and comment period. The County will consider any comments or views of County residents received in writing, or orally at public hearings, in preparing the final Amended AAP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final Amended AAP for submission to HUD.

d. Submission to HUD

The final Amended AAP will be submitted to HUD within thirty (30) calendar days following the end of the public display and comment period.

Consolidated Annual Performance and Evaluation Report (CAPER)

Report Development

Howard County shall follow the following procedures in the drafting of its CAPER

a. Report Consideration

The Community Planning and Grants staff will evaluate and report the accomplishment and expenditures of the previous program year for CDBG and HOME in accordance with HUD regulations.

b. Public Display and Comment Period

The draft CAPER will be placed on display for a period of no less than fifteen (15) calendar days to encourage public review and comment. The public notice will include a brief summary of the purpose of the CAPER, the dates of the public display and comment periods, the locations where copies of the draft CAPER can be examined, and how comments will be accepted.

c. Comments Received on the Draft CAPER

The County Contact Person, or his/her designee, will accept written comments during the 15-day public display and comment period. The County will consider any comments or views of County residents received in writing, or orally during the public hearing, in writing the final CAPER. A summary of these comments or views, and a summary of views not accepted and the reason why, will be attached to the final CAPER to HUD.

d. Submission to HUD

The CAPER will be submitted annually to HUD no later than September 28.

Amendment to the Approved Citizen Participation Plan (CPP)

Howard County shall follow the following procedures to amend its approved CPP, as needed. The County will provide the public with a reasonable opportunity to comment on substantial amendments to the CPP and will make the CPP public.

a. Amendment Considerations

The County will amend the CPP, as necessary, to ensure adequate engagement and involvement of the public in making decisions related to its HUD programs. Substantial amendments to the CPP may be required should a provision of the CPP be found by the County to conflict with HUD regulations, or when changes in HUD regulations occur. Edits to the CPP that only include updated contact information or editorial changes for clarity will not be released for public review and comment.

b. Public Display and Comment Period

The proposed Amended CPP will be placed on display for a period of no less than thirty (30) calendar days to encourage public review and comment. The public notice shall include the dates of public display and comment period, the locations where copies of the proposed Amended CPP can be examined, how comments will be accepted, and the anticipated submission date to HUD.

c. Public Comments Received on Draft Amended CPP

The County Contact Person or his/her designee will accept written comments during the public review period. A summary of all written comments, and those received orally during the CPP public hearing, will be attached to the amended CPP prior to submission to HUD.

d. Public Hearing

The County will conduct a public hearing to review and accept public comments on the draft amended CPP prior to its approval and submission to HUD.

e. Submission to HUD

A copy of the amended CPP, including a summary of all written comments and those received during the public hearing, will be submitted to HUD. A summary of any comments or views not accepted, and the reasons why, shall be submitted to HUD as well.

D. Submission of Comments and Proposals:

Howard County shall encourage the submission of comments and proposals regarding both entitlement programs by citizens, particularly low- and moderate income persons and residents of blighted neighborhoods. Such comments and proposals shall be submitted to the Department of Housing and Community Development, 6751 Columbia Gateway Drive, 3rd Floor, Columbia, Maryland 21046.

Howard County shall provide responses to all proposals stating the reasons for the actions taken, within fourteen (14) days subsequent to when such actions are taken, but in no case later than the final hearing on the pre-application.

E. Technical Assistance:

The Department of Housing and Community Development shall provide technical assistance to individual citizens and citizen groups, especially those groups representative of persons of low- or moderate income, as may be required to adequately provide for citizen participation in the planning, implementation and assessment of the CDBG and HOME programs. Such technical assistance is intended to increase citizen participation in the community development decision making process and to ensure that such participation is meaningful. Technical assistance shall also be utilized to foster public understanding of CDBG and HOME program requirements. Technical assistance shall be provided on request and may include, but is not limited to: interpreting the CDBG and HOME programs and their rules, regulations, procedures and/or requirements; providing information and/or materials concerning the CDBG and HOME programs; and, assisting low- and moderate income citizens, and residents of blighted neighborhoods to identify their needs, and to develop activities and proposals for projects which, when implemented, will resolve those needs.

F. Information Dissemination:

Howard County shall provide for the public, residents, public agencies, and other interested parties full public access to program information and make affirmative efforts to render adequate information to citizens, especially to those of low- and moderate income, and to those residing in lower income or blighted neighborhoods.

Howard County shall make public the proposed AFH and the proposed CP in a manner that affords interested parties a reasonable opportunity to examine each document's content. The County shall publish:

1. Informational Meetings:

At the time when the County begins planning for the Community Development Program, meetings shall be held describing the following:

- Funds available, if known;
- Range of activities that may be undertaken and the kind of activities previously funded;
- Ineligible activities;
- Plans to minimize displacement of persons and plans for assistance of any persons displaced;
- Process to be followed in drawing up and approving the pre-application and applications, and the schedule of meetings and hearings; and
- Citizen Participation Plan.

2. Handouts:

The Department of Housing Community Development shall develop handouts:

- Outlining the CDBG and HOME Programs;
- Indicating the range of activities;
- Noting the application process; and
- Summary of important program requirements.

These handouts will be made available to citizen organizations, public agencies, and groups pursuing the interests of the low- and moderate income persons, through mailings and distributions at the public information meetings and hearings.

3. Information Disclosure:

Howard County shall provide full and timely disclosure of program records and information, in a manner that protects personal privacy and obligations of confidentiality as recognized by (5) U.S.C. 522 and the applicable Howard County laws. In this respect, the County shall make available all relevant documents concerning the program for citizen inspection upon request during normal office hours at the Department of Housing Community Development, 6751 Columbia Gateway Drive, 3rd floor, Columbia, Maryland 21046

4. Public Availability of Application:

At the time the pre-application and/or the full application has been submitted to HUD, Howard County shall make reasonable efforts to inform citizens involved in, or affected by the Program, that the application had been submitted and is available to interested parties upon request. Notice to that effect shall be published in newspapers as identified in Section H of this Plan. When the notice for the submission of the pre-application, and /or the full application, is published, it shall be stated that persons wishing to object to the approval of such application or pre-application may make their objections known to HUD's Baltimore Area Office. (See Section J).

Howard County shall make available copies of the CPP, the proposed APP application and the CAPER at the Department of Housing Community Development, 6751 Columbia Gateway Drive, 3rd floor, Columbia, Maryland 21046.

G. Meetings:

Howard County shall hold County-wide and/or community wide meetings to provide information and respond to questions about CPD Programs. Appropriate organizations and the public at large shall be informed of these meetings through press releases, legal notices and mailings. Minutes of those meetings shall be obtained and kept in the record.

H. Public Hearings:

Citizen participation in the community development process will be conducted on a community-wide basis and will actively involve the views and proposals of all citizens, especially low- and moderate income persons and residents of areas where CDBG or HOME activities are proposed or on-going.

Public hearings will be held during all phases of the community development process, as outlined herein, to allow citizens to voice opinions and offer proposals concerning the development and performance of CDBG and HOME programs. Howard County will respond to questions and proposals from citizens at each public hearing. Any questions that citizens may have concerning a program will be answered and their comments, suggestions, and/or proposals will be received. Citizens may also express comments and views concerning the community development process, or any specific CDBG or HOME project, to the governing body at any regularly scheduled meeting.

The County will conduct the following:

- Two public meetings to obtain views of citizens at the initial stage of the CP, AFH, and the APP development;
- One public hearing by the County Council on the proposed APP prior to the adoption of the resolution by the County Council authorizing filing of such APP;
- One public hearing subsequent to the approval of the APP by the Department of Housing and Community Development;
- In cases of an APP amendment(s), when prior HUD approval is required, the County shall hold at least one (1) formal public hearing;
- One public hearing will be conducted for review and comment on the CAPER prior to submission to HUD;
- These hearings shall be held at convenient times and locations, and shall be so arranged that full participation of persons with disabilities is possible; and
- Howard County shall publish a notice indicating time, place, procedures of the hearing and topics to be considered in the non-legal sections of the following newspapers, by giving at least then (10) days notice prior to each public hearing:

Howard County Times
Columbia Flier

I. Complaints and Objections:

Any complaints regarding the County's CDBG Program or HOME Program shall be directed, in writing, to the Department of Housing Community Development, 6751 Columbia Gateway Drive, 3rd floor, Columbia, Maryland 21046. Written responses shall be provided by the Department of Housing and Community Development within fifteen (15) working days of receipt of such complaints.

Persons wishing to object to approval of an application by HUD shall make such objections known to the U.S. Department of Housing and Urban Development (HUD), Baltimore Area Office, Maryland State Office, 10 South Howard Street, Baltimore, Maryland 21201. HUD will consider objections made only on the following grounds: The applicant's description of needs and objectives is plainly inconsistent with available facts and data; or the activities to be undertaken are plainly inappropriate to meeting the needs and objectives identified by the applicant; or the application does not comply with the legislative or administrative requirements.

Persons wishing to file complaints of housing discrimination may contact the Department of Housing and Urban Development (HUD) by utilizing the (HUD) toll-free complaint hot line, 1-800-669-9777, or by filing a Housing Discrimination Complaint form (HUD Form 903). Copies of the Housing Discrimination Complaint form are available in the HUD Office and will be furnished upon request to anyone wishing to file such a complaint.

Persons employed in a HUD assisted program who wish to file complaints of employment discrimination may contact the U.S. Equal Employment Opportunity Commission at (410) 962-3932.

All persons wishing to file either housing or employment discrimination complaints may also contact the Howard County Office of Human Rights (410) 313-6430 to explore their rights under Howard County's Human Rights legislation.

J. Disaster Relief Citizen Participation Planning:

In the event of a disaster, the County will utilize its CDBG and HOME Program funds for disaster recovery, in a manner that does not duplicate efforts carried out by the Federal Emergency Management Association (FEMA). The County will deploy its disaster relief planning in a manner similar to the planning of the AAP and CP, unless the disaster prohibits public and/or large gatherings to solicit input, which will focus on the three (3) items below:

- How funds may need to be reallocated in the case of a disaster;
- How will reallocation decisions be made; and
- How will CPD funds be used.

Following the disaster relief and long term planning, the County will then update its AAP to reflect the updated priorities that have resulted due to the disaster. CDBG and HOME eligible activities will then be re-prioritized to meet the current needs of the County following the disaster. The County will adhere to the public comment period for the AAP as defined in this

document, unless HUD's guidance allows for a shorter period of time, but not less than 5 days. CPD grantees may designate program funds from existing or future program years.

Overall Benefit

The County will continuously prepare for future disaster events by proactively managing its certification with the low- and moderate income benefit requirement. Howard County has an area benefit first quartile exception which is 23.61 percent.

Partnerships

In the event of a disaster, the County will work with all relevant local entities involved in disaster response and long term recovery planning such as citizen planning boards, community-based and faith-based organizations, the business community, developers, non-profit organizations, philanthropic groups and the public at large. CPD funds will be used for long term recovery efforts primarily and for short term disaster relief as needed. The Federal government provides disaster relief primarily through the Federal Emergency Management Agency (FEMA) and the Small Business Administration (SBA) to meet emergency, short-term recovery needs. FEMA provides temporary housing and non-housing needs such as food and clothing, grants toward infrastructure and public building reconstruction, and improvements to prevent damage from future disasters. The SBA provides loans to businesses and individuals for impacted property not covered by insurance. The County intends to assess the assistance provided by these federal agencies as well as other local agencies before committing CPD program funds.

Community Development Block Grant Funds

All CDBG activities, including those used for disaster response and recovery, must meet a national objective. While the primary objective of the program is to benefit low- and moderate income persons, a grantee may be able to undertake activities under the slum/blight or urgent need national objectives to address disaster response or recovery needs.

Overall Benefit

The County will continuously prepare for future disaster events by proactively managing its certification with the low- and moderate income benefit requirement. Howard County has an area benefit first quartile exception which is 23.61 percent.

Below is a list of CDBG eligible activities that can be used during disaster relief and long term disaster recovery:

- Housing rehabilitation,
- Housing reconstruction,
- Short-term rental subsidies
- Homebuyer programs replacing disaster damaged residences,
- Acquisition programs that purchase properties in flood plains,

- Infrastructure improvements,
- Demolition of buildings,
- Reconstruction or replacement of public facilities,
- Deductible amount of a homeowner's insurance,
- Small business grants and loans, and
- Relocation assistance for people moved out of floodways.

Section 108 Loan Guarantees for Post Disaster Community Needs

Section 108 Loan Guarantee program is another source of assistance for redevelopment of affected areas. Entitlement communities can receive loan guarantees that do not exceed five times their CDBG allocations. There is a maximum repayment period of 20 years, which is one way to spread out the cost of recovery. Section 108 Loan Guarantees can be used to finance a range of activities that can enhance recovery, including acquisition of real property, rehabilitation of publicly owned real property, housing rehabilitation, public facilities and economic development activities. Should this program be employed to facilitate recovery, the County will utilize the citizen planning practices mentioned in this manual.

Home Investment Partnership Funds (HOME)

CDBG funds can be used for public services and fair housing activities, however HOME Program funds can be used for the creation, maintenance and repair of housing units. Below is a list of specific activities that can be utilized for disaster relief:

- Repair,
- Rehabilitate,
- Rebuild properties,
- New construction,
- Direct homeownership assistance, and
- Tenant-Based Rental Assistance (TBRA) for renting housing units only and households that cannot receive FEMA assistance. HOME TBRA cannot be used for hotels or other temporary shelter.

HUD may suspend certain HOME statutory requirements and waive regulatory requirements to facilitate the use of HOME funds for disaster recovery; however, provisions related to affordability, income targeting, environmental standards, and labor standards cannot be suspended. Section 290 of the HOME Investment Partnership Act provides suspension authorization to address the damage in area for which the President has declared a disaster.

Under the authority of Section 290 and 24 CFR 92.4, some of the common HOME statutory and regulatory suspensions and waivers include:

- Waiver of the requirements governing the operation of a TBRA program to allow for rapid re-housing of displaced tenants, including the consolidated plan certification requirement, tenant selection procedures, maximum subsidy limitations, housing quality

standards, the definition of security deposit, and program operation (Section 212(a)(3)(Act); §92.209(b), (c), (h), (i), (j) and (k));

- Waiver of the requirement to use source documentation for initial income determination for program beneficiaries. Instead the County will use self-certifications (§92.203(a)(1)(ii));
- Waiver of the requirement that an owner of rental housing assisted with HOME funds adopt written tenant selection policies and procedures and provide tenants with a one-year lease (Section 225(Act), §92.253(d);
- Waiver of the requirement that 15 percent of each HOME allocation be used for housing owned, developed or sponsored by community housing development organizations (CHDOs) (section 231 (Act), §92.300(a)(1); and
- Waiver of the maximum per unit subsidy amount of HOME funds for disaster-damaged properties (Section 212 (Act), §92.222(b));

CPD Notice 17-06 provides further guidance related to recovery and disaster planning for local participating jurisdictions.

K. County Contact

All communication regarding the CPP, the AFH, the CP, the APP, the CAPER, comments, complaints shall be directed to:

Elizabeth Meadows, Chief of Community Planning and Grants
Howard County Department of Housing and Community Development
9820 Patuxent Woods Drive, Suite 224
Columbia, Maryland 21046
Phone: (410) 313 – 6324

L. Approval

This Citizen Participation Plan will be effective until it is amended or replaced by Howard County, Maryland.

Approved:

Kelly A. Cimino, Director

Howard County Department of Housing & Community Development

Date